

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION**

IN RE: Sueann Rogers } Case No:14-10056  
Debtor }  
} Chapter 7  
Sueann Rogers } Judge W.H. Drake, Jr.  
Movant }  
v. }  
1<sup>st</sup> Franklin Financial }  
} Respondent }  
}

**MOTION TO AVOID JUDICIAL LIEN**

COME NOW the Debtors, by and through counsel, to represent as follows:

(1)

This motion is brought pursuant to 11 U.S.C. Section 522(f)(1), and Bankruptcy Rule 4003(d) to avoid a judicial lien that impairs exemptions to which the Debtors are entitled.

(2)

The debt owed to the Respondent is secured by a judicial lien arising in the Magistrate Court of Magistrate County. Said judicial lien impairs exemptions that the Debtors have properly claimed in C of the petition pursuant to 11 U.S.C. Section 522 and O.C.G.A. Section 44-13-100.

WHEREFORE, Movant pray for an Order avoiding said judicial lien and for such other and further relief as is just and proper.

This March 10, 2014.

/s/ Gina Karrh

H. Brooks Cotten, Bar # 189545  
Gina Karrh, Bar # 408378  
H. Brooks Cotten, P.C.

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**NOTICE OF REQUIREMENT OF RESPONSE TO MOTION TO AVOID LIEN ON  
EXEMPT PROPERTY AND OF TIME TO FILE SAME**

NOTICE IS HEREBY GIVEN that a Motion to Avoid Lien on exempt property pursuant to 11 U.S.C. Section 522(f) has been filed in the above-styled case.

NOTICE IS FURTHER GIVEN that pursuant to Local Rule 6008(2) NDGa, the Respondent must file a Response to the Motion within 21 days after service, exclusive of the day of service, and serve a copy of the same on Movant. In the event that no response is timely filed and served, then the Bankruptcy Court may enter an Order granting the relief sought.

This March 10, 2014.

/s/ Gina Karrh  
H. Brooks Cotten, Bar # 189545  
Gina Karrh, Bar # 408378  
Attorney for Movant  
H. Brooks Cotten, P.C.  
5 Jackson Street  
Newnan, GA 30263  
770/683-3303

**CERTIFICATE OF SERVICE**

The undersigned, Gina Karrh, hereby certifies:

That I am, and at all times hereafter mentioned, was more than 18 years of age, and that on March 10, 2014, I served a copy of the within "Notice of Requirement of Response to Motion to Avoid Lien on Exempt Property and of Time to File Same, together with the Motion to Avoid Lien" filed in this bankruptcy case on the above-named Respondent by placing same in the U.S. Mail with sufficient postage affixed thereto and properly addressed as follows :

Adam M Goodman  
Chapter 13 Trustee  
260 Peachtree Street  
Atlanta GA 30303

H. Brooks Cotten, P.C.  
5 Jackson Street  
Newnan, Ga 30263

1<sup>st</sup> Franklin Fincial  
c/o Barbara Martin, manager  
P.O. Box 279  
Villarica Ga 30180

/s/ Gina Karrh

H. Brooks Cotten, Bar No: 189545  
Gina Karrh , Bar # 408378  
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